

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

FILED
10/6/2020 12:28 PM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2020L010629

RAYMOND COOPER,)
plaintiff,)
v.)
DOUBLETREE MANAGEMENT, LLC,)
a Foreign Limited Liability Company, d/b/a)
DOUBLETREE BY HILTON CHICAGO-)
MAGNIFICENT MILE, DOUBLETREE BY)
HILTON CHICAGO – MAGNIFICENT MILE,)
individually, HILTON MANAGEMENT, LLC,)
a Foreign Limited Liability Company,)
DOUBLETREE HOTEL SYSTEMS, LLC,)
a Foreign Limited Liability Company, THE)
CHARTRES LODGING GROUP, LLC,)
a Foreign Limited Liability Company and)
KOKUA HOSPITALITY, LLC, a Foreign)
Limited Liability Company)
defendants.)

Case No. 2020L010629

COMPLAINT

The plaintiff, RAYMOND COOPER, by his attorneys, STOTIS & BAIRD CHARTERED, complains of the defendants, DOUBLETREE MANAGEMENT, LLC, d/b/a DOUBLETREE BY HILTON CHICAGO-MAGNIFICENT MILE, DOUBLETREE BY HILTON CHICAGO – MAGNIFICENT MILE, individually, HILTON MANAGEMENT, LLC, DOUBLETREE HOTEL SYSTEMS, LLC, THE CHARTRES LODGING GROUP, LLC, and KOKUA HOSPITALITY, LLC (hereinafter collectively referred to as “Doubletree”), as follows:

1. That for some time prior to and on October 16, 2018, the defendant, Doubletree, was a Foreign Limited Liability Company authorized to do business in the State of Illinois.

2. That for some time prior to and on October 16, 2018, defendant Doubletree, owned, operated, managed and maintained a hotel known as Doubletree by Hilton Chicago-Magnificent Mile, located at 300 E. Ohio Street, in the City of Chicago, State of Illinois.

3. That on or about October 16, 2018, the plaintiff Raymond Cooper was lawfully on the premises at the aforesaid location.

4. That at all times material hereto, it was the duty of the defendants to maintain the property and equipment in a condition that was reasonably safe for persons lawfully on said property.

5. That the defendants committed one or more of the following negligent acts and/or omissions:

- a. stacked laundry and linens over a safe height in bins to be transported by laundry contractors;
- b. allowed the laundry and linens in said bins to overflow over the top and edges of the bins;
- c. created an unsafe condition in which it was likely that laundry and linens would fall into the path of persons transporting the bins;
- d. created an unreasonably dangerous condition for persons transporting bins;
- e. failed to correct the dangerous condition after being warned in advance not to stack laundry to excessive heights.

6. That due to one or more of the foregoing negligent acts, laundry and linens spilled over the side of said bins, causing the plaintiff to fall and become injured.

7. That as a direct and proximate result thereof, the plaintiff sustained personal injury, pain and suffering, disfigurement and disability, was caused to incur medical bills and lose wages, all to his damage, all of which will continue into the future.

WHEREFORE, the plaintiff, RAYMOND COOPER, through his attorneys, STOTIS & BAIRD CHARTERED, prays for a judgment in excess of \$50,000, exclusive of interest and costs, against defendants, DOUBLETREE MANAGEMENT, LLC, d/b/a DOUBLETREE BY HILTON CHICAGO-MAGNIFICENT MILE, DOUBLETREE BY HILTON CHICAGO – MAGNIFICENT MILE, individually, HILTON MANAGEMENT, LLC, DOUBLETREE HOTEL SYSTEMS, LLC, THE CHARTRES LODGING GROUP, LLC, and KOKUA HOSPITALITY, LLC.

Respectfully Submitted,

STOTIS & BAIRD CHARTERED

By: /s/Eric J. Parker
Eric J. Parker

#13589
STOTIS & BAIRD CHARTERED
Attorneys for Plaintiff
200 West Jackson Boulevard, #1050
Chicago, Illinois 60606-6941
312/461-1000
notice@stotis-baird.com